

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

SEITU SULAYMAN KOKAYI,

Defendant.

Criminal No. 1: 18-CR-410-LMB

Hon. Leonie M. Brinkema

Trial Date: April 8, 2019

**GOVERNMENT’S TRIAL EXHIBIT LIST**

The United States of America, by and through its attorneys G. Zachary Terwilliger, United States Attorney, Kellen S. Dwyer and Dennis M. Fitzpatrick, Assistant United States Attorneys, and Joseph Attias, Special Assistant United States Attorney, hereby submits its list of exhibits.

GX	Description	Offer	Admit
1.	Kokayi Resume		
2.	2/18/2018 text to different minor student with link to video titled “The Role of Muslim Women”		
3.	Subscriber information for Kokayi Instagram account		
4.	Select photographs of Minor Female MFV (MFV) from her Instagram account		
5.	4/22/18 video of Kokayi driving while MFV tries to touch his face, saved on defendant’s phone		
6.	6/1/18 Instagram direct message from Kokayi to MFV saying “Happy Birthday”		
7.	6/1/18 Instagram direct message from Kokayi to MFV saying “Drum Solo for your birthday”		
8.	6/1/18 Instagram direct message from Kokayi to MFV saying “So happy for you”		
9.	6/11/18 Kokayi text to old number used by MFV to thank her family for having him over for dinner		
10.	[omitted]		
11.	[omitted]		
12.	6/18/18—6/25/18 Emails between Kokayi and MFV about Kokayi helping MFV get a visa		
13.	Google subscriber information for Kokayi’s Gmail account		

14.	Document identifying MFV's age found on Kokayi's computer		
15.	[omitted]		
16.	Text messages and attached photographs sent to defendant showing MFV's green card and travel itinerary		
17.	7/24/18 Instagram direct messages between Kokayi and MFV regarding a ride to the airport on 8/4/18		
18.	7/27/18 Instagram direct message from Kokayi to MFV on Instagram stating "I just feel like I've been chasing you guys down lately"		
19.	7/27/18 Instagram direct message from Kokayi to MFV, stating "I just feel like I've been running into a wall"		
20.	8/1/18 Instagram direct message from Kokayi to MFV regarding picture MFV posted on Instagram		
21.	8/2/18 text between Kokayi and MFV from MFV's sister's phone regarding taking MFV and her sister to airport		
22.	Recording from 8/4 Session ID Number: 224855556		
22(a)	Excerpts from above call 22A-1 22A-2 22A-3		
22(b)	Transcripts of GX 22 Excerpts 22B-1 22B-2 22B-3		
23.	8/4/18 Instagram messages between Kokayi and MFV re MFV's new phone number		
24.	8/4/18 3 second video of Kokayi driving and saying "of course" recovered from MFV's phone		
25.	8/4/18 3 second video of Kokayi putting on sunglasses and MFV saying "dimples" recovered from MFV's phone		
26.	[omitted]		
27.	8/7/18 Kokayi text to MFV stating "I hope it doesn't make you feel some type of way towards me" and "Okay, wanted to tell you something but was going to Face Time you"		
28.	8/8/18 Instagram messages with picture of Kokayi in the dark		
29.	Recording from 8/9/18 Session ID Number: 224971340		
29(a)	Excerpts from above call 29A-1 29A-2 29A-3		

	29A-4		
29(b)	Transcripts of GX 29 Excerpts 29B-1 29B-2 29B-3 29B-4		
30.	8/9/18 FaceTime Photograph of Kokayi in black polo shirt recovered from MFV's phone		
31.	8/9/18 FaceTime video of Kokayi in black polo shirt recovered from MFV's phone		
32.	Recording from 8/10/18 Session ID Number: 225023653		
32(a)	Excerpts from above call 32A-1 32A-2 32A-3		
32(b)	Transcripts of GX 32 Excerpts 32B-1 32B-2 32B-3		
33.	Recording from 8/11/18 Session ID Number: 225082015		
33(a)	Excerpts from above 33A-1 33A-2 33A-3 33A-4 33A-5		
33(b)	Transcripts of GX 33 Excerpts 33B-1 33B-2 33B-3 33B-4 33B-5		
34.	Second Recording from 8/11/18 Session ID Number: 225083065		
34(a)	Excerpts from above 34A-1 34A-2 34A-3 34A-4 34A-5 34A-6		
34(b)	Transcripts of GX 34 Excerpts 34B-1 34B-2 34B-3 34B-4		

	34B-5 34B-6		
35.	[omitted]		
36.	8/12/18 Facetime Photo of Kokayi without shirt recovered from MFV's phone		
37.	8/12/18 Facetime Video of Kokayi without shirt recovered from MFV's phone		
38.	Recording from 8/12/18 Session ID Number: 225112925		
38(a)	Excerpt from above call 38A-1		
38(b)	Transcript of GX 38 Excerpt 38B-1		
39.	8/14/18 Texts between Kokayi and MFV in which MFV sends Kokayi picture of Kokayi without shirt and he responds "omg u saved it"		
40.	Recording from 8/15/18 Session ID Number: 225193944		
40(a)	Excerpt from above 40A-1		
40(b)	Transcript of GX 40 Excerpt 40B-1		
41.	8/15/18 FaceTime video of Kokayi in blue shirt and white earphones and MFV says something inaudible in the background recovered from MFV's phone		
42.	8/17/18 FaceTime photo of Kokayi in white tank top and earphones recovered from MFV's phone		
43.	8/17/18 FaceTime video of Kokayi in white tank top and earphones recovered from MFV's phone		
44.	Recording from 8/19/18 Session ID Number: 225316222		
44(a)	Excerpts from above 44A-1 44A-2 44A-3 44A-4		
44(b)	Transcript of GX 44Excerpts 44B-1 44B-2 44B-3 44B-4		
45.	8/19/18 text from Kokayi to MFV stating "oh btw I will get you guys Insha'Allah from the airport. 9pm right?"		
46.	8/19/18 Instagram photo of MFV geo-tagged at [Midwestern landmark]		
47.	8/22/18: Kokayi texts pictures of himself to MFV and says "sorry, that's all the pic I've got with me"		
48.	Recording of 8/22/18		

	Session ID Number: 45443		
48(a)	Excerpts from above 48A-1 48A-2		
48(b)	Transcripts of GX 48 Excerpts 48B-1 48B-2		
49.	8/22/18 Facetime Photograph of KOKAYI with black tanktop recovered from MFV's phone		
50.	8/22/18 Facetime Video of KOKAYI with black tanktop recovered from MFV's phone		
51.	Recording of 8/22/18 Session ID Number: 45446		
51(a)	Excerpt of above 51A-1		
51(b)	Transcript of GX 51 Excerpt 51B-1		
52.	Recording of 8/22/18 Session ID Number: 225419128		
52(a)	Excerpts from above 52A-1 52A-2 52A-3 52A-4		
52(b)	Transcripts of GX 52 Excerpts 52B-1 52B-2 52B-3 52B-4		
53.	Recording of 8/22/18 Session ID Number: 45452		
53(a)	Excerpt from above		
53(b)	Transcript of GX 53 excerpt		
54.	Recording of 8/22/18 Session ID Number: 225421728		
(a)	Excerpt from above 54A-1		
(b)	Transcript from GX 54 Excerpt 54A-2		
55.	Miranda form		
56.	Video of defendant's voluntary interview		
56(a)	Relevant excerpts of defendant's voluntary interview 56A-1 56A-2 56A-3 56A-4 56A-5 56A-6 56A-7 56A-8		

	56A-9 56A-10 56A-11		
56(b)	Transcript of excerpts of defendant's voluntary interview 56B-1 56B-2 56B-3 56B-4 56B-5 56B-6 56B-7 56B-8 56B-9 56B-10 56B-11		
57.	iPhone seized from Kokayi		
58.	Extraction of Kokayi iPhone		
59.	Apple subscriber information for Kokayi		
60.	Photographs of MFV's iPhone taken at the time of the search		
61.	Extraction of MFV iPhone		
62.	Select photographs ("selfies") of MFV from MFV phone		
63.	Apple subscriber info for MFV's iCloud		
64.	Photographs of MFV's iPhone taken at the time of return		
65.	Copy of MFV passport		
66.	Copy of MFV birth certificate		
67.	Video of MFV interview		
67(a)	Excerpts of MFV interview 67A-1 67A-2 67A-3 67A-4 67A-5 67A-6 67A-7 67A-8 67A-9 67A-10 67A-11 67A-12 67A-13 67A-14		
67(b)	Screenshot of MFV interview		
68.	Photographs from search of Kokayi house		
69.	Email and attached apartment lease showing defendant's address		

70.	Apple records showing 69 Facetime calls with MFV in August 2018		
71.	Summary chart showing number, dates, locations, and length of Facetime and audio calls between Kokayi and MFV		
72.	Cell phone precision location data for Kokayi's phone		
73.	Map showing physical location of location data identified in GX72		
74.	Spirit airlines records of MFV travel		
75.	Chart showing dates, times, and durations of phone calls between Kokayi and MFV		
76.	Kokayi personnel file listing his age, phone number and email address		
77.	Disk containing 256 recorded audio calls between MFV and minor in August 2018		
78.	Selected Kokayi Google Searches		
79.	Disk containing Session ID Numbers: 45443, 45446, and 45452		
80.	Recording of 8/2 call Session ID Number: 224802462		
80(a)	Excerpts from above call 80A-1 80A-2 80A-3 80A-4		
80(b)	Transcripts of GX 80 Excerpts 80B-1 80B-2 80B-3 80B-4		
81.	Photographs of the defendant's phone in his bedroom		
82.	Photographs of the defendant's phone after data extraction		

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

By:                     /s/                    

Kellen S. Dwyer  
Dennis M. Fitzpatrick  
Assistant United States Attorneys  
Joseph Attias  
Special Assistant United States Attorney  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Phone: 703-299-3700  
Kellen.Dwyer@usdoj.gov

## CERTIFICATE OF SERVICE

I hereby certify that on this day, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send an electronic copy to all counsel of record in this matter.

By: /s/  
Kellen S. Dwyer  
Assistant United States Attorney  
Eastern District of Virginia  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Phone: 703-299-3700